

EXHIBIT A



April 15, 2025

Michael B. Shortnacy

VIA CERTIFIED AND ELECTRONIC MAIL

**Re: MDL 3084 – Order re Withdrawal of Counsel in
Case No. 3:24-CV-07553-CRB**

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Dear C.A.:

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *C.A. v. Uber Technologies, Inc., et al.*, 3:24-CV-07553-CRB, which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On January 17, 2025, Anapol Weiss moved to withdraw its representation of you on the grounds that you have “failed to respond to Counsel’s numerous communication attempts via telephone, email, and text.” *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB, ECF 2105 at 2 (Exhibit 1). On April 8, 2025, the Court granted that motion. *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB, ECF 2724 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff[.]” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of April 8, 2025, i.e. by Tuesday, May 6, 2025, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to mshortnacy@shb.com, jtaylor@shb.com, and kfrazier@shb.com at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

Sincerely,

SHOOK, HARDY & BACON LLP

By: /s/ Michael Shortnacy
Michael Shortnacy

EXHIBIT 1

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15 *Counsel for Plaintiff*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 IN RE: UBER TECHNOLOGIES, INC.
20 PASSENGER SEXUAL ASSAULT
21 LITIGATION

22 MDL: No. 3084 CRB

23 Honorable Charles R. Breyer

24 This Document Relates to:

25 **MOTION TO WITHDRAW AS**
26 **COUNSEL OF RECORD**

27 *C.A. v. Uber Technologies, Inc., et al.*
28 Case No. 3:24-cv-07553

29 Pursuant to Local Rule 11-5, William L. Smith and Holly Dolejsi of Anapol Weiss,
30 counsel of record for Plaintiff C.A. (“Counsel”), respectfully moves this Court for an Order
31 allowing their firm to withdraw as counsel of record in the above-captioned matter.

32 Over the past several months, Plaintiff C.A. has failed to comply with Counsel’s numerous
33 requests to produce her PFS form. Counsel advised Plaintiff on December 12, 2024, that her PFS
34 form was past due and requested Plaintiff’s assistance in submitting the items that were identified
35 during a meet and confer with opposing counsel earlier that afternoon. Counsel continued to

1 follow-up with Plaintiff but has not received a response to date. Plaintiff C.A. has failed to
 2 respond to Counsel's numerous communication attempts via telephone, email, and text messages.

3 On December 20, 2024, Counsel advised Plaintiff in writing of their intent to withdraw
 4 from this matter via electronic mail if she did not respond by December 27, 2024. At the time of
 5 this filing, Plaintiff has still not responded to Counsel. Counsel has advised Defendants of his
 6 firm's intent to withdraw from this matter during follow-up meet and confer discussions if he did
 7 not hear from Plaintiff.

8 WHEREFORE, the law firm of Anapol Weiss; and all attorneys of record for Plaintiff
 9 request that they be allowed to withdraw as counsel of record for Plaintiff C.A. A copy of this
 10 motion will be served upon Plaintiff at her last known address and via electronic mail.

11
 12 Dated: January 17, 2025

Respectfully submitted,

13
 14 **ANAPOL WEISS**

15 By: /s/ William L. Smith
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 23 *Counsel for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I electronically transmitted the forgoing MOTION TO WITHDRAW to the Clerk's Office using the CM/ECF System for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.

/s/ William L. Smith
William L. Smith

EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084

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This Order Relates To:

C.A. v. Uber, Inc.,
Case No. 3:24-cv-07553-CRB

**ORDER RE WITHDRAWAL OF
COUNSEL**

Re: Dkt. No. 2105

Plaintiff's counsel's motion to withdraw is granted. Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss this case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiff and file a declaration within 7 days of this ruling explaining how they did so.

IT IS SO ORDERED.

Dated: April 8, 2025



CHARLES R. BREYER
United States District Judge